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12-21-00

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

15 West Yakima Avenue, Suite 200 • Yakima, Washington 98902-3452 • (509) 575-2490

December 21, 2000

BRIAN - FYI

CERTIFIED MAIL

7000 0520 0022 6373 5758

Mr. Bill Newcomb
Supervisor
Long Painting Co.
8025 10th Avenue South
Seattle, WA 98108

**RE: Manifest Discrepancies for Paint Related Hazardous Waste Shipped from the
Re-paint Project on SR-182 Bridges #82114 and #82115 Near Selah, Washington**

Dear Mr. Newcomb:

I was contacted by a concerned citizen about the disposition of several 55-gallon drums containing hazardous waste labels that had been accumulated near the Selah bridge re-paint project. Since this was a Washington State Department of Transportation (DOT) project, I contacted Mr. James Morin who is an assistant environmental field coordinator for DOTs' South Central Regional Office. We agreed to meet to review the paperwork related to the management of this waste.

During the meeting held at the regional DOT office on 12/18/00, manifest discrepancies were discovered. The generator ID# WAH000001664 issued to the DOT for the bridge location had been activated on June 23, 2000, in anticipation of the re-paint project. A review of the Uniform Hazardous Waste Manifest prepared for the transportation of this waste revealed that Long Painting Co. was listed as the generator of the waste, and their generator ID# for the 10th Avenue site in Seattle was used in block #1. Each EPA/State generator ID# is site specific and cannot be used for hazardous waste that is generated at another location. Discrepancies such as these cause interruptions in the "cradle to grave" tracking system for hazardous waste.

In order to correct these discrepancies, a revised manifest with DOT listed as the generator along with their ID# WAH000001664 must be prepared and supplied to all transporters, the receiving facility and to DOT. This revision is critical for proper record keeping for all parties involved. Hazardous waste generated at this site is required to be reported by DOT on their annual report under this ID#. Long Painting should only be reporting hazardous waste

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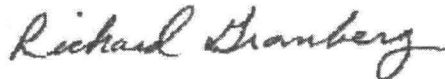
Mr. Bill Newcomb
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generated at sites where Long Painting has notified as a generator of hazardous waste, such as their site on 10th Avenue in Seattle.

I called you to discuss these problems on 12/19/00, and you said that the transporter, Romic Environmental, was aware of the mistakes and was completing a corrected manifest. Provide a copy to my attention at this office as well as to DOT and all transporters as mentioned above. Also as we discussed, develop and implement a training plan to be used to train those in your company that have a responsibility for managing and manifesting hazardous waste. Provide a copy of that plan to this office as well.

Please do not hesitate to contact me if you have any questions or concerns with the contents of this letter. I can be reached at (509) 457-7147. I am also sending a copy of this letter to Ecology's Northwest Regional office since Long Painting is a notified generator location within their jurisdiction.

Sincerely,



Richard Granberg
Hazardous Waste Specialist/Inspector
Hazardous Waste and Toxics Reduction Program
Central Regional Office
Washington State Department of Ecology

RLG:rrp

cc: James Morin, Washington State Department of Transportation
Department of Ecology, Northwest Regional Office

509-575 2809

LongPainting

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To: <u>Bill Newcomb</u>	From: <u>Richard Granberg/rp</u>
Fax: <u>206-767-3895</u>	Page: _____
Phone: _____	Date: <u>Thursday, December 21, 2000</u>
Re: _____	CC: _____
